

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

DORIS ANN SCOTT and ORIEL MOORE,

Plaintiffs,

v.

TREVOR FOLEY, in his official and individual capacity as DIRECTOR of the MISSOURI DEPARTMENT OF CORRECTIONS, et al.,

Defendants.

Case No. 2:24-cv-04107-MDH

**DEFENDANT BRYANNE BRADSHAW'S ANSWER TO
SECOND AMENDED COMPLAINT (Dkt. 112)**

Defendant Bryanne Bradshaw (“Bradshaw”) states and alleges the following for her Answer to the operative Second Amended Complaint, Dkt. 112 (“Complaint”). Certain Counts of the Complaint are not directed against Bradshaw and seek no relief against her. Bradshaw therefore does not respond to them, as indicated below under each applicable Count of the Complaint.

PLAINTIFFS' PRELIMINARY STATEMENT

1. The allegations of Paragraph 1 of the Complaint present Plaintiffs' description of their claims in a conclusory, argumentative fashion that is made in the context of or intermingled with one or more legal conclusion(s) to which no response is required. Bradshaw denies Plaintiffs' description of the events giving rise to this case, including in the context of the legal conclusions and denies application of the legal conclusion(s) against her interests in this case. To the extent the allegations contained in the legal conclusion(s) may be construed to allege a claim against Bradshaw, the same is denied. Further answering, Bradshaw denies that she committed a tort or

engaged in tortious or other wrongful conduct towards Othel Moore, Jr., as alleged in the Paragraph and the Complaint generally.

2. The allegations of Paragraph 2 of the Complaint set out a summary description of Plaintiffs' claims, including in the context of one or more legal conclusion(s) to which no response is required. Bradshaw denies Plaintiffs' description of the events giving rise to this case in the context of the legal conclusion(s) and denies application of the legal conclusion(s) against her interests in this case. To the extent the allegations contained in the legal conclusion(s) may be construed to allege a claim against Bradshaw, the same is denied. Further answering, Bradshaw denies that she committed a tort or engaged in tortious or other wrongful conduct towards Othel Moore, Jr., as alleged in the Paragraph and the Complaint generally. Bradshaw denies any allegations in the Paragraph referencing her individually, including as to her being the cause of any alleged wrongful action or inaction towards Othel Moore, Jr. Further answering, Bradshaw is without sufficient information to admit or deny the allegations of the Paragraph not relating to alleged action or inaction by Bradshaw personally and therefore denies such allegations with demand for strict proof thereof.

3. The allegations of Paragraph 3 of the Complaint assert vague, conclusory, and inflammatory allegations against Bradshaw and one or more Co-Defendants, including the governmental agency Co-Defendant, regarding incidents other than that alleged to have occurred towards Othel Moore, Jr., and do not allege involvement by Bradshaw with such other events and/or circumstances. Bradshaw is without sufficient information to admit or deny the allegations regarding vague, undefined, unrelated incidents and therefore denies all factual allegations of the Paragraph with demand for strict proof thereof. Further answering, as to those allegations regarding Othel Moore, Jr., Bradshaw denies Plaintiffs' description of the events giving rise to this

case, including in the context of the legal conclusion(s) asserted in the Paragraph, which Bradshaw denies. To the extent the allegations contained in the legal conclusion(s) may be construed to allege a claim against Bradshaw, the same is denied. Further answering, Bradshaw denies that she committed a tort or engaged in tortious or other wrongful conduct towards Othel Moore, Jr., as alleged in the Paragraph. Bradshaw denies any allegations in the Paragraph referencing or alluding to her individually, including as to her being the cause of any alleged wrongful action or inaction towards Othel Moore, Jr.

4. In response to the allegations of Paragraph 4 of the Complaint, Bradshaw denies the allegations, asserted collectively against numerous Defendants (including Bradshaw), with demand for strict proof thereof. Bradshaw denies she was a “CERT” Defendant, as alleged in the Paragraph. Bradshaw denies that she, an individual Defendant, engaged in improper or tortious conduct towards Othel Moore, Jr., as such is alleged in the Paragraph. Bradshaw is without sufficient information to form a belief as to the allegations against other Defendants and therefore denies the allegations for lack of information, with demand for strict proof thereof. Bradshaw denies any other factual allegations of the Paragraph.

5. In response to the allegations of Paragraph 5 of the Complaint, Bradshaw denies the allegations, asserted collectively against numerous Defendants (including Bradshaw), with demand for strict proof thereof. Bradshaw denies she was a “CERT” Defendant, as alleged in the Paragraph. Bradshaw denies that she, an individual Defendant, engaged in improper or tortious conduct towards Othel Moore, Jr., as such is alleged in the Paragraph. Bradshaw is without sufficient information to form a belief as to the allegations against other Defendants and therefore denies the allegations for lack of information, with demand for strict proof thereof. Bradshaw denies any other factual allegations of the Paragraph.

6. The allegations of Paragraph 6 of the Complaint purport to quote from statements by the referenced Defendant presented without context, date, or other means of authenticating the accuracy of the statements, and Bradshaw therefore is without sufficient information to form a belief as to the allegations and denies them, with demand for strict proof thereof. The remaining allegations of the Paragraph are asserted collectively against numerous Defendants (including Bradshaw), which Bradshaw denies, with demand for strict proof thereof. Bradshaw denies that she, an individual Defendant, engaged in improper or tortious conduct towards Othel Moore, Jr., as such is alleged in the Paragraph. Bradshaw denies any other factual allegations or conclusions of the Paragraph.

7. In response to the allegations of Paragraph 7 of the Complaint, Bradshaw is without sufficient information to form a belief as to the allegations against other Defendants and therefore denies the allegations for lack of information, with demand for strict proof thereof. As to the criminal charges against Bradshaw, she is charged in the Charging Document with accessory to assault second degree and felony murder/murder in the second degree. Bradshaw denies any factual allegations of the Paragraph in consistent with the facts alleged herein.

ALLEGATIONS REGARDING JURISDICTION AND VENUE

8. Bradshaw states that the allegations of Paragraph 8 of the Complaint comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

9. Bradshaw states that the allegations of Paragraph 9 of the Complaint comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegations

referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

10. Bradshaw states that the allegations of Paragraph 10 of the Complaint comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegations referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

ALLEGATIONS REGARDING PARTIES

11. Bradshaw is without sufficient knowledge to know the current residency or biological relationship of Plaintiff, Dorris Ann Scott, as to Othel Moore, Jr., as alleged in Paragraph 11 of the Complaint. The qualification of the referenced Plaintiff to bring this action on behalf of all Class I wrongful death statutory beneficiaries, and the existence of said Class, comprise one or more legal conclusion(s) to which no answer is required. Bradshaw denies the application of any legal conclusion against her interests. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

12. Bradshaw is without sufficient knowledge to know the current residency or biological relationship of Plaintiff, Oriel Moore, as to Othel Moore, Jr., as alleged in Paragraph 12 of the Complaint. The qualification of the referenced Plaintiff to bring this action on behalf of all Class II wrongful death statutory beneficiaries, and the existence of said Class, comprise one or more legal conclusion(s) to which no answer is required. Bradshaw denies the application of any legal conclusion against her interests. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any. With the involvement of a Class I Plaintiff, Bradshaw denies the legal appropriateness of any Class II Plaintiff.

13. In response to the allegations of Paragraph 13 of the Complaint, Bradshaw is without sufficient knowledge to admit or deny the allegations and therefore deny the same, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

14. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 14 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

15. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 15 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Further answering, the second sentence of the Paragraph alleges one or more legal conclusion(s) to which no answer is required. Bradshaw denies the application of any legal conclusion against her interests. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

16. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 16 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

17. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 17 of the Complaint (which expressly reference another Defendant and not Bradshaw)

and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any. Further answering, Bradshaw admits that Doris Falkenrath was Warden of the referenced facility at the time of the subject incident.

18. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 18 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

19. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 19 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

20. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 20 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

21. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 21 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof

thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

22. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 22 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

23. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 23 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

24. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 24 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

25. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 25 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

26. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 26 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

27. In response to the allegations of Paragraph 27 of the Complaint, Bradshaw admits she is currently a resident of the State of Missouri and formerly worked for the Missouri Department of Corrections. Bradshaw denies all remaining allegations of the Paragraph, with demand for strict proof thereof. Bradshaw denies that she committed a tort or engaged in tortious or other wrongful conduct towards Othel Moore, Jr., as alleged in the Paragraph and the Complaint generally.

28. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 28 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

29. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 29 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

30. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 30 of the Complaint (which expressly reference another Defendant and not Bradshaw)

and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

31. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 31 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

32. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 32 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

33. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 33 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

34. Bradshaw is without sufficient knowledge to form a belief as to the allegations of Paragraph 34 of the Complaint (which expressly reference another Defendant and not Bradshaw) and therefore denies them for lack of information at this juncture, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any.

ALLEGATIONS COMPRISING FACTUAL BACKGROUND

35. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 35 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies that she was a member of the CERT Team on the day of the subject incident or at any other relevant time. Bradshaw denies witnessing the events alleged in the Paragraph.

36. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 36 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

37. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 37 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not

limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies entering the cell area referenced in the Paragraph during the events referenced therein. Bradshaw denies witnessing the events alleged in the Paragraph.

38. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 38 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies entering the cell area referenced in the Paragraph or interacting with Plaintiffs’ Decedent during the events referenced therein. Bradshaw denies witnessing the events alleged in the Paragraph.

39. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 39 of the Complaint and therefore denies them for lack of information,

with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies entering the cell area referenced in the Paragraph or interacting with Plaintiffs’ Decedent during the events referenced therein. Bradshaw denies witnessing the events alleged in the Paragraph.

40. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 40 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies entering the cell area referenced in the Paragraph or interacting with Plaintiffs’ Decedent during the events referenced therein. Bradshaw denies witnessing the events alleged in the Paragraph.

41. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 41 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies entering the cell area referenced in the Paragraph or interacting with Plaintiffs’ Decedent during the events referenced therein. Bradshaw denies witnessing the events alleged in the Paragraph.

42. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 42 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies entering the cell area referenced in

the Paragraph or interacting with Plaintiffs' Decedent during the events referenced therein. Bradshaw denies witnessing the events alleged in the Paragraph.

43. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 43 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the "CERT Defendants" or "CERT Team" referenced in the Paragraph.

44. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 44 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the "CERT Defendants" or "CERT Team" referenced in the Paragraph.

45. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 45 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

46. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 46 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device on Plaintiffs’ Decedent, as alleged in the Paragraph.

47. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 47 of the Complaint and therefore denies them for lack of information,

with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device on Plaintiffs’ Decedent, as alleged in the Paragraph.

48. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 48 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device on Plaintiffs’ Decedent, as alleged in the Paragraph.

49. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 49 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not

limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device on Plaintiffs’ Decedent, as alleged in the Paragraph.

50. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 50 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device or any other device on Plaintiffs’ Decedent, as alleged in the Paragraph.

51. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 51 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not

limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

52. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 52 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device or any other device on Plaintiffs’ Decedent, as alleged in the Paragraph.

53. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 53 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof

thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device or any other device on Plaintiffs’ Decedent, as alleged in the Paragraph.

54. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 54 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device or any other device on Plaintiffs’ Decedent, as alleged in the Paragraph.

55. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 55 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein,

if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device or any other device on Plaintiffs’ Decedent, as alleged in the Paragraph.

56. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 56 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device or any other device on Plaintiffs’ Decedent, as alleged in the Paragraph.

57. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 57 of the Complaint and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively, either directly by name or by implication. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual

name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Bradshaw denies involvement in the placing of a WRAP device or any other device on Plaintiffs’ Decedent, as alleged in the Paragraph. Bradshaw denies involvement in the act of transporting Plaintiffs’ Decedent, as alleged in the Paragraph.

58. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 58 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

59. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 59 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

60. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 60 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated,

unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

61. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 61 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph. Further answering, Bradshaw generally denies the allegations of the Paragraph.

62. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 62 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph. Further answering, Bradshaw generally denies the allegations of the Paragraph.

63. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 63 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph. Further answering, Bradshaw generally denies the allegations of the Paragraph.

64. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 64 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph. Further answering, Bradshaw generally denies the allegations of the Paragraph.

65. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 65 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief,

certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

66. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 66 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

67. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 67 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

68. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 68 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis

of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

69. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 69 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

70. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 70 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

71. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 71 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated,

unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

72. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 72 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

73. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 73 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

74. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 74 of the Complaint, which reference her individually, and therefore

denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

75. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 75 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

76. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 76 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

77. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 77 of the Complaint, which reference her individually, and therefore denies the same at this juncture. Further answering, Bradshaw is aware of an unauthenticated, unsourced video not directly referenced in the Paragraph but, on information and belief, the basis of the allegations herein against Bradshaw that purports to reveal, on information and belief, certain events alleged in the Paragraph involving Bradshaw. Bradshaw is without sufficient knowledge to admit or deny the content of the video at this juncture and therefore denies the allegations of the Paragraph.

78. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 78 of the Complaint and therefore denies the same.

79. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 79 of the Complaint and therefore denies the same.

80. Bradshaw states that she is without sufficient knowledge to admit or deny the allegations of Paragraph 80 of the Complaint and therefore denies the same.

81. Bradshaw denies the allegations of Paragraph 81 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

82. Bradshaw denies the allegations of Paragraph 82 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph. Further answering, Bradshaw generally denies the allegations of the Paragraph.

83. Bradshaw denies the allegations of Paragraph 83 of the Complaint, and its subparts, to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

84. Bradshaw denies the allegations of Paragraph 84 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw,

but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

85. Bradshaw denies the allegations of Paragraph 85 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

86. Bradshaw denies the allegations of Paragraph 86 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing

Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

87. Bradshaw denies the allegations of Paragraph 87 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph 87 comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

88. Bradshaw is without sufficient knowledge to admit or deny the allegations of Paragraph 88 of the Complaint and therefore denies the same.

89. Bradshaw is without sufficient knowledge to admit or deny the allegations of Paragraph 89 of the Complaint and therefore denies the same. In the Paragraph, Plaintiffs reference an investigation conducted by the Missouri Department of Corrections, but Plaintiffs do not attach any written report of the investigation as authored by said entity and instead describe Plaintiffs’ interpretation of the investigation’s outcome. Bradshaw denies any characterization or mischaracterization of the investigation or its outcome.

90. Bradshaw is without sufficient knowledge to admit or deny the allegations of Paragraph 90 of the Complaint and therefore denies the same. In the Paragraph, Plaintiffs

reference an investigation conducted by the Missouri Department of Corrections, but Plaintiffs do not attach any written report of the investigation as authored by said entity and instead describe Plaintiffs' interpretation of the investigation's outcome. Bradshaw denies any characterization or mischaracterization of the investigation or its outcome.

91. Bradshaw generally is without sufficient knowledge to form a belief as to the allegations of Paragraph 91 of the Complaint regarding other Defendants and therefore denies them for lack of information, with demand for strict proof thereof. Further answering, Bradshaw denies any remaining allegations of the Paragraph. The Charging Document charges Bradshaw with accessory to assault second degree and felony murder/murder in the second degree.

92. Bradshaw denies the allegations of Paragraph 92 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests. Bradshaw denies being a member of the "CERT Defendants" or "CERT Team" referenced in the Paragraph.

93. Bradshaw denies the allegations of Paragraph 93 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

94. Bradshaw denies the allegations of Paragraph 94 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

95. Bradshaw denies the allegations of Paragraph 95 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies

them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

96. Bradshaw denies the allegations of Paragraph 96 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

97. Bradshaw denies the allegations of Paragraph 97 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no

answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

98. Bradshaw denies the allegations of Paragraph 98 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

99. Bradshaw denies the allegations of Paragraph 99 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal

conclusions. Bradshaw denies the application of any legal conclusion against her interests. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

100. Bradshaw denies the allegations of Paragraph 100 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

101. Bradshaw denies the allegations of Paragraph 101 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

102. Bradshaw denies the allegations of Paragraph 102 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Bradshaw denies being a member of the “CERT Defendants” or “CERT Team” referenced in the Paragraph.

103. Bradshaw denies the allegations of Paragraph 103 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT I—Alleging 42 USC § 1983—Eighth Amendment—Excessive Force

104. Bradshaw incorporates herein her responses to all prior Paragraphs of the Complaint.

105. Bradshaw states that the allegations of Paragraph 105 of the Complaint, in the context of the lawsuit, comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegations that are referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

106. Bradshaw states that the allegations of Paragraph 106 of the Complaint, in the context of the lawsuit, comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegations that are referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

107. Bradshaw denies the allegations of Paragraph 107 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

108. Bradshaw denies the allegations of Paragraph 108 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

109. Bradshaw denies the allegations of Paragraph 109 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

110. Bradshaw denies the allegations of Paragraph 110 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without

sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

111. Bradshaw denies the allegations of Paragraph 111 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

112. Bradshaw denies the allegations of Paragraph 112 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and

therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

113. Bradshaw denies the allegations of Paragraph 113 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

114. Bradshaw denies the allegations of Paragraph 114 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual

allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

115. Bradshaw denies the allegations of Paragraph 115 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

116. Bradshaw denies the allegations of Paragraph 116 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations

referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT II–Alleging 42 USC § 1983-Eighth Amendment–Cruel and Unusual Punishment

117. Bradshaw incorporates herein her responses to all prior Paragraphs of the Complaint.

118. Bradshaw states that the allegations of Paragraph 118 of the Complaint, in the context of the lawsuit, comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegations that are referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

119. Bradshaw states that the allegations of Paragraph 119 of the Complaint, in the context of the lawsuit, comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegations that are referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

120. Bradshaw denies the allegations of Paragraph 120 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

121. Bradshaw denies the allegations of Paragraph 121 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

122. Bradshaw denies the allegations of Paragraph 122 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

123. Bradshaw denies the allegations of Paragraph 123 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

124. Bradshaw denies the allegations of Paragraph 124 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

125. Bradshaw denies the allegations of Paragraph 125 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

126. Bradshaw denies the allegations of Paragraph 126 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

127. Bradshaw denies the allegations of Paragraph 127 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

128. Bradshaw denies the allegations of Paragraph 128 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

129. Bradshaw denies the allegations of Paragraph 129 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

130. Bradshaw denies the allegations of Paragraph 130 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT III–Alleging 42 USC § 1983–Eighth Amendment–Deliberate Indifference

131. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

132. Bradshaw denies the allegations of Paragraph 132 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

133. Bradshaw denies the allegations of Paragraph 133 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

134. Bradshaw denies the allegations of Paragraph 134 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

135. Bradshaw denies the allegations of Paragraph 135 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

136. Bradshaw denies the allegations of Paragraph 136 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

137. Bradshaw denies the allegations of Paragraph 137 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

138. Bradshaw denies the allegations of Paragraph 138 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

139. Bradshaw denies the allegations of Paragraph 139 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

140. Bradshaw denies the allegations of Paragraph 140 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

141. Bradshaw denies the allegations of Paragraph 141 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

142. Bradshaw denies the allegations of Paragraph 142 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

143. Bradshaw denies the allegations of Paragraph 143 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

144. Bradshaw denies the allegations of Paragraph 144 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

145. Bradshaw denies the allegations of Paragraph 145 of the Complaint.

COUNT IV–Alleging 42 USC § 1983–Failure to Intervene

146. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

147. Bradshaw denies the allegations of Paragraph 147 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations

referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

148. Bradshaw denies the allegations of Paragraph 148 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

149. Bradshaw denies the allegations of Paragraph 149 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

150. Bradshaw denies the allegations of Paragraph 150 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

151. Bradshaw denies the allegations of Paragraph 151 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

152. Bradshaw denies the allegations of Paragraph 152 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

153. Bradshaw denies the allegations of Paragraph 153 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

154. Bradshaw denies the allegations of Paragraph 154 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

155. Bradshaw denies the allegations of Paragraph 155 of the Complaint.

COUNT V-Alleging 42 USC § 1983–Unconstitutional Policy of Deliberate Indifference

156–167. Plaintiffs’ allegations in this Count, specifically Paragraphs 156-167, are not directed against Bradshaw and, therefore, Bradshaw does not respond to the allegations.

COUNT VI-Alleging 42 U.S.C. § 1983–Supervisory Liability

168-171. Plaintiffs’ allegations in this Count, specifically Paragraphs 168-171, are not directed against Bradshaw and, therefore, Bradshaw does not respond to the allegations.

COUNT VII–Alleging 42 U.S.C. § 1983–Alleged Deliberate Indifference–Failure to Train

172-182. Plaintiffs’ allegations in this Count, specifically Paragraphs 172-182, are not directed against Bradshaw and, therefore, Bradshaw does not respond to the allegations.

COUNT VIII–Alleging Wrongful Death

183. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

184. Bradshaw states that the allegations of Paragraph 184 of the Complaint comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegations that are referenced as supporting the legal conclusions.

185. Bradshaw denies the allegations of Paragraph 185 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

186. Bradshaw denies the allegations of Paragraph 186 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual

allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

187. Bradshaw denies the allegations of Paragraph 187 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

188. Bradshaw denies the allegations of Paragraph 188 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

189. Bradshaw denies the allegations of Paragraph 189 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT IX–Alleging Negligence

190. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

191. Bradshaw denies the allegations of Paragraph 191 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

192. Bradshaw denies the allegations of Paragraph 192 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

193. Bradshaw denies the allegations of Paragraph 193 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

194. Bradshaw denies the allegations of Paragraph 194 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

195. Bradshaw denies the allegations of Paragraph 195 of the Complaint and its subparts to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

196. Bradshaw denies the allegations of Paragraph 196 of the Complaint and its subparts to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the

Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

197. Bradshaw denies the allegations of Paragraph 197 of the Complaint and its subparts to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

198. Bradshaw denies the allegations of Paragraph 198 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct

alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

199. Bradshaw denies the allegations of Paragraph 199 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

200. Bradshaw denies the allegations of Paragraph 200 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited

to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

201. Bradshaw denies the allegations of Paragraph 201 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

202. Bradshaw denies the allegations of Paragraph 202 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations

referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT X-Alleging Battery

203. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

204. Bradshaw denies the allegations of Paragraph 204 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

205. Bradshaw denies the allegations of Paragraph 205 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual

allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

206. Bradshaw denies the allegations of Paragraph 206 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

207. Bradshaw denies the allegations of Paragraph 207 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations

referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

208. Bradshaw denies the allegations of Paragraph 208 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

209. Bradshaw denies the allegations of Paragraph 209 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

210. Bradshaw denies the allegations of Paragraph 210 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

211. Bradshaw denies the allegations of Paragraph 211 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

212. Bradshaw denies the allegations of Paragraph 212 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

213. Bradshaw denies the allegations of Paragraph 213 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT XI-Alleging Assault

214. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

215. Bradshaw denies the allegations of Paragraph 215 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

216. Bradshaw denies the allegations of Paragraph 216 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

217. Bradshaw denies the allegations of Paragraph 217 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

218. Bradshaw denies the allegations of Paragraph 218 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

219. Bradshaw denies the allegations of Paragraph 219 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

220. Bradshaw denies the allegations of Paragraph 220 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

221. Bradshaw denies the allegations of Paragraph 221 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

222. Bradshaw denies the allegations of Paragraph 222 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

223. Bradshaw denies the allegations of Paragraph 223 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

224. Bradshaw denies the allegations of Paragraph 224 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT XII–Alleging Intentional Infliction of Emotional Distress

225. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

226. Bradshaw denies the allegations of Paragraph 226 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

227. Bradshaw denies the allegations of Paragraph 227 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

228. Bradshaw denies the allegations of Paragraph 228 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

229. Bradshaw denies the allegations of Paragraph 229 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

230. Bradshaw denies the allegations of Paragraph 230 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

231. Bradshaw denies the allegations of Paragraph 231 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT XIII–Alleging Negligent Infliction of Emotional Distress

232. Bradshaw incorporates her responses to all prior Paragraphs of the Complaint.

233. Bradshaw denies the allegations of Paragraph 233 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

234. Bradshaw denies the allegations of Paragraph 234 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication.

Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

235. Bradshaw denies the allegations of Paragraph 235 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

236. Bradshaw denies the allegations of Paragraph 236 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

237. Bradshaw denies the allegations of Paragraph 237 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

238. Bradshaw denies the allegations of Paragraph 238 of the Complaint to the extent they allege involvement of Bradshaw or seek liability against her for the alleged wrongful conduct alleged or referenced therein. Further answering, the allegations of the Paragraph are not limited to Bradshaw, but concern other Defendants, individually or collectively. Bradshaw is without sufficient information to form a belief as to the allegations regarding other Defendants and therefore denies them, with demand for strict proof thereof. Bradshaw denies any factual allegations of the Paragraph not specifically admitted herein, if any, and denies any allegations referencing Bradshaw individually, either directly by individual name or through implication. Further answering, the allegations of the Paragraph comprise one or more legal conclusions to

which no answer is required. Bradshaw denies any factual allegation referenced as supporting the legal conclusions. Bradshaw denies the application of any legal conclusion against her interests.

COUNT XIV–Alleging Negligent Training/Supervision

239-245. Plaintiffs’ allegations in this Count, specifically Paragraphs 239-245, are not directed to Bradshaw and, therefore, Bradshaw does not respond to the allegations.

COUNT XV–Alleging Negligent Retention of Private Contractor

246-256. Plaintiffs’ allegations in this Count, specifically Paragraphs 246-256, are not directed to Bradshaw and, therefore, Bradshaw does not respond to the allegations.

AFFIRMATIVE AND OTHER DEFENSES

1. The Complaint fails to allege sufficient facts to state a claim against Bradshaw under any of the theories against her. Plaintiffs’ pleading of their claims is vague, conclusory, and without sufficient facts to state a claim or have a reasonable likelihood of success on the merits.

2. The Complaint fails to allege sufficient facts to state a claim against Bradshaw upon which relief can be granted in Counts IX, X-XIII due to a lack of standing pursuant to RSMo. § 537.020.

3. The Complaint fails to allege sufficient facts to state a claim against Bradshaw in Count XIII by failing to demonstrate that either or both Plaintiffs were in the zone of danger.

4. Bradshaw specifically denies the allegations made in the Complaint, but any actions by Bradshaw were discretionary in nature and taken in good faith and this defendant is therefore protected from liability by the doctrine of qualified immunity. Bradshaw is protected from liability and suit under the doctrines of qualified, absolute, judicial, and official immunity.

5. Bradshaw specifically denies the existence of any causal connection between Plaintiffs’ alleged damages and the action or inaction attributed to Bradshaw, as alleged by

Plaintiffs in the Complaint. Bradshaw is protected from liability pursuant to the public duty doctrine because she was performing a governmental function to benefit the public. Plaintiffs failed to state a claim for exemplary damages against Bradshaw because Plaintiffs have not pled facts that demonstrate by clear and convincing evidence that she engaged in outrageous conduct based upon an evil motive or reckless indifference to the rights of Plaintiffs or their Decedent.

6. The negligence and non-compliance with rules, policies, protocols, procedures, requests, and directives exhibited by Plaintiffs' Decedent during the events in question contributed to the injuries and damages alleged.

7. Plaintiffs' Decedent, by his own conduct, provoked or consented to any alleged acts or omissions by this Defendant by refusing instructions of various correctional officers and refusing to comply.

8. Plaintiffs' Decedent, by his own conduct, assumed the risk of injury by refusing instructions of various correctional officers and refusing to comply.

9. The Complaint meets the standard of being frivolous within the meaning of 28 U.S.C. § 1915(d) because Plaintiffs have no reasonable likelihood of success on the merits. All defenses available under 42 U.S.C. § 1983 are herein invoked. Bradshaw cannot be held liable under a theory of respondeat superior.

10. Bradshaw did not violate the United States Constitution or any statutory right held by Decedent in her actions or inactions during the relevant events.

11. The negligence, fault, conduct, behavior, acts of Decedent or one or more persons or entities over which Bradshaw had no control or right to control caused the injuries alleged herein, and the fault of these persons or entities should be compared and any damages be reduced or apportioned in accordance with Missouri law. An allocation of fault pursuant to RSMo. §

537.067 should be made if this Defendant is found to bear less than 51% fault. All limitations in Missouri law applicable to Bradshaw pursuant to RSMo. § 537.067 are invoked.

12. Each Government Official is only liable for his or her own alleged misconduct (which is expressly denied herein). Plaintiffs fail to identify specific conduct attributable to Bradshaw and is speculative.

13. Plaintiffs allege that multiple actors may be liable for their damages. If a Defendant or other Party makes a settlement with Plaintiffs, or if Plaintiffs receive anything of value from such a Party, individual, or entity, the amount of such payment or consideration should be treated as a payment in full satisfaction of the damages of Plaintiffs or, in the alternative, that the amount of payment or consideration should be set off against any judgment that may be entered against Bradshaw. Bradshaw may claim reliance upon RSMo. § 537.060, such that Bradshaw is entitled to a reduction in the amount of money from any verdict of any agreements and/or settlements with any Defendant herein, whether previously a Defendant, or currently a Defendant, including but not limited to any Party who has settled, or may in the future settle with Plaintiffs, and Bradshaw is entitled to a reduction of the claim or verdict against her by the stipulated amount of the agreement, or by the amount of consideration paid, whichever is greater.

14. Pleading hypothetically and in the alternative, Bradshaw states that the sole and proximate cause of the alleged damages of and harm to Plaintiffs and Plaintiffs' Decedent, if any, were the intervening acts or omissions of persons or entities other than Bradshaw over whom Bradshaw has no control, including without limitation the medical characteristics, negligence, fault, conduct and behavior of Plaintiffs' Decedent. Bradshaw committed no act that proximately caused the death of Plaintiffs' Decedent. Fault should be compared and reduced/apportioned under comparative fault law.

15. In the event damages are awarded for future damages in excess of the amount specified in RSMo. § 538.220(2), said damages should be payable in periodic or installment payments.

16. The Complaint fails to set forth special damages, or allegations, with enough specificity or certainty. Any verdict rendered in this case for future damages must be itemized and expressed by the trier of fact at present value pursuant to RSMo. § 538.215.2. In the event non-economic damages are awarded to Plaintiffs, the limitation on non-economic damages (damage caps) provided under RSMo. § 538.210 or other applicable statute shall be applied, and in accordance with RSMo. § 538.215, or said statute, any award of non-economic damages in excess of the limit shall be reduced by the Court to the maximum amount allowed by law.

17. In the event Plaintiffs are awarded any damages, Plaintiffs are not entitled to any recovery for mental or emotional injury for the reasons set forth in the Prison Litigation Reform Act, 42 U.S.C. § 1997, *et seq.*, including 42 U.S.C. § 1997(e). Further, Plaintiffs and/or their Decedent did not exhaust available administrative remedies, including grievance procedures, and conditions precedent under this law.

18. RSMo. § 538.300 prohibits pre-judgment and post-judgment interest in the circumstances herein, and Plaintiffs' prayer for such relief should therefore be stricken.

19. The claim(s) of Decedent's sister for wrongful death lack standing, as she is a Class 2 litigant under RSMo. § 537.080(1) ("...or by the father or mother of the deceased, natural or adoptive") and may only bring a claim if no Class 1 litigant exists. Here Decedent's mother is alive and prosecuting this case. *See Call v. Heard*, 925 S.W.2d 840, 850 (Mo. banc 1996). Neither Plaintiff has opened a probate estate in the Circuit Court of Cole County, Missouri. No personal

representative therein has been appointed. Plaintiffs lack standing under the survivorship statute, RSMo. § 537.020.

20. Pursuant to RSMo. § 490.715, the actual amount necessary to satisfy the financial obligation to a health care provider represents the value of the medical treatment rendered.

21. Plaintiffs have failed to allege facts sufficient to give rise to a claim for punitive damages against Bradshaw.

22. An award of punitive damages deprives Bradshaw of property without due process of law in violation of her rights under federal and/or state constitutions, and the standard for determining whether to impose punitive damages is vague and indefinite, does not provide adequate guidance to the trier of fact, and fails to require proof of an appropriate standard.

23. Regarding the events described in the Complaint, Bradshaw never employed conduct or failed to employ conduct in a manner that was intentional, willful, wanton, or malicious, and never showed a complete indifference to or a conscious disregard of any rights, such that Bradshaw would be liable for punitive damages.

24. Plaintiffs' claim for punitive damages, if granted in the amount pled or any other amount, would be grossly excessive and would violate the Due Process Clause of the Fourteenth Amendment to the U.S. Constitution and the Missouri Constitution.

25. Bradshaw has not received fair notice that she could be subject to substantial punitive damages in this state for the conduct alleged.

26. Plaintiffs seek punitive damages greatly disproportionate to any actual damages and far exceed any civil or criminal sanctions that could be imposed as similar alleged misconduct.

27. Plaintiffs' claim for punitive damages would violate the Eighth Amendment to the U.S. Constitution and the Missouri Constitution because it seeks to impose an excessive fine on Bradshaw, is penal in nature, and seeks to punish Bradshaw using vague standards.

28. Plaintiffs' claim for punitive damages would violate the Equal Protection Clause to the Fourteenth Amendment to the U.S. Constitution and the Missouri Constitution because different amounts can be awarded against two or more Defendants for the same or similar act or conduct.

29. Plaintiffs' claim for punitive damages violates the Due Process clause of the Fifth and Fourteenth Amendments to the U.S. Constitution and the Missouri Constitution because it seeks to punish Bradshaw based on unconstitutionally vague standards.

30. Plaintiffs' claim for punitive damages would violate the Fifth Amendment to the U.S. Constitution and the Missouri Constitution because it would expose Bradshaw to multiple punishments and fines for the same conduct.

31. Plaintiffs' claim for punitive damages violates the Due Process clause of the Fifth and Fourteenth Amendments to the United States Constitution and the Missouri Constitution in the absence of an order bifurcating that claim from the issue of liability.

32. Any award of punitive damages in this case would violate the Separation of Powers Doctrine since this Court and the jury would be usurping the exclusive power of the legislature to define crimes and establish punishment.

33. To the extent Plaintiffs seek punitive damages based at least in part on harm done to persons or entities other than Plaintiffs themselves, such an award would violate the due process provisions of the Fifth and Fourteenth Amendments to the United States Constitution and their equivalent in the Missouri Constitution.

34. Bradshaw reserves the right to amend, modify, or supplement her defenses as discovery in this matter proceeds.

WHEREFORE, having fully answered the Complaint for Damages and raised her affirmative and other defenses, Defendant Bryanne Bradshaw requests the Court to dismiss the Complaint, alternatively find in favor of this Defendant on the Complaint, award this Defendant costs of this action, and award such other and further relief as the Court deems just and proper.

JURY DEMAND

Defendant Bryanne Bradshaw demands a trial by jury on all claims so triable.

Respectfully submitted,

BATY OTTO SCHEER P.C.

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CERTIFICATE OF SERVICE

This certifies the foregoing was filed with the Court via the Court's e-filing system on May 6, 2025, with copies the same day via electronic mail to:

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